

Defendant.

Civil File No.: **2:18-cv-00189-RWS**

**JOINT MOTION TO SUSPEND DEADLINE AND
FOR SCHEDULING CONFERENCE**

COMES NOW Plaintiffs Cindy Cosper and Allan Myers, and Defendant Ford Motor Company (“Ford”) and hereby file this Joint Motion to Amend Scheduling Deadlines, showing the Court as follows:

In its October 17, 2022 Order on Ford’s Motion for Summary Judgment [Doc. 158], the Court instructed the parties to file a Proposed Consolidated Pretrial Order “within 30 days of the entry of this order”, which falls on November 16, 2022. However, no trial date has been set yet in this case.

Therefore, the parties hereby jointly request that the Court enter an Order

(1) suspending the current November 16, 2022 deadline for the filing of the Proposed Consolidated Pretrial Order, and (2) setting a scheduling conference to discuss possible trial dates and pretrial deadlines. A proposed Order is attached hereto for the Court's consideration.

This 10th day of November, 2022.

WATSON SPENCE LLP

/s/ Philip A. Henderson

Michael R. Boorman
Georgia Bar No. 067798
Philip A. Henderson
Georgia Bar No. 604769
999 Peachtree Street, N.E.
Suite 1130
Atlanta, Georgia, 30309
Telephone: (229) 436-1545
mboorman@watsonspence.com
phenderson@watsonspence.com

- and -

D. Alan Thomas
Admitted Pro Hac Vice
Paul F. Malek
Admitted Pro Hac Vice
HUIE, FERNAMBUCQ & STEWART, LLP
3291 US Highway 280
Suite 200
Birmingham, AL 35243
Telephone: (205) 251-1193
athomas@huilaw.com
pmalek@huilaw.com

Counsel for Ford Motor Company

/s/C. Tab Turner
C. Tab Turner
Turner & Associates, P.A.
4705 Somers Avenue
Suite 100
North Little Rock, Arkansas
501-791-2277
tab@tturner.com

/s/ Nathan R. Nicholson
Matthew E. Cook
Georgia Bar No. 184399
Kate S. Cook
Georgia Bar No. 280584
Robert H. Childres III
Georgia Bar No. 721558
Nathan R. Nicholson
Georgia Bar No. 390553
P.O. Box 2415
Gainesville, GA 30503
678-928-3899 Telephone
888-612-0589 Facsimile
matt@cook-lawgroup.com
kate@cook-lawgroup.com
robert@cook-lawgroup.com
nathan@cook-lawgroup.com

Jonathan A. Parrish
Georgia Bar No. 263008
The Parrish Law Firm, LLC
Resurgens Plaza, Suite 2250
945 East Paces Ferry Road, NE
Atlanta, GA 30326
jparrish@parrishfirm.com
Tel: 404-891-0141
Fax: 404-891-0143
Attorneys for Plaintiff

FONT CERTIFICATE

Pursuant to Local Rule 7.1D, I hereby certify that this pleading was prepared using a font and point selection approved by the Court in Local Rule 5.1C.

WATSON SPENCE LLP

/s/ Philip A. Henderson

Philip A. Henderson

Georgia Bar No. 604769

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

C. Tab Turner
Turner and Associates, P.A.
4705 Somers Avenue, Suite 100
North Little Rock, AR 72116
tab@tturner.com

Matthew E. Cook
Nathan Nicholson
Cook Law Group, LLC
P.O. Box 2415
Gainesville, Georgia 30503
matt@cook-lawgroup.com
Nathan@cook-lawgroup.com

Jonathan A. Parrish
The Parrish Law Firm, LLC
Resurgens Plaza, Suite 2250
945 East Paces Ferry Road, NE
Atlanta, Georgia 30326
jparrish@parrishfirm.com

This 10th day of November, 2022.

/s/ Philip A. Henderson

Philip A. Henderson
Georgia Bar No. 604769